

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

ePLUS, INC.,

Civil Action No. 3:09-cv-620 (JRS)

Plaintiff,

v.

LAWSON SOFTWARE, INC.,

Defendant.

**DECLARATION OF LAURENE J. MCENENY**

I, Laurene J. McEneny, declare as follows:

1. I make this declaration on my own information, knowledge, and belief.

2. I co-owned PurchasingNet, the company that created and sold P.O. Writer Plus Version 10. I produced documents regarding P.O. Writer Plus Version 10 for the ePlus v. SAP lawsuit and testified in the ePlus v. SAP trial about P.O. Writer Plus Version 10.

3. Attorneys from Lawson contacted me in April and May of this year. Lawson's counsel was interested in obtaining documents and information relating to P.O. Writer Plus Version 10. During those conversations, I told Lawson's counsel, Rachel Hughey, that I previously provided all documents in my possession regarding P.O. Writer Plus Version 10 to SAP during the previous litigation between ePlus and SAP. Ms. Hughey informed me that she had the materials from the ePlus v. SAP case. I did not provide Ms. Hughey with any documents because I had nothing additional to provide to Lawson.



4. Attorneys from ePlus served a subpoena for documents and a deposition on me, dated May 5, 2010. ePlus asked me to provide them a copy of all of the documents I had given to Lawson. I provided ePlus with the correspondence between myself and Lawson.

5. Attorneys from Lawson served a subpoena for a deposition on me, dated May 10, 2010.

6. Neither subpoena asked me to produce the P.O. Writer Plus Version 10 manual that I produced previously in the ePlus-SAP litigation. Because I believed the documents Lawson had asked about would have been available to Lawson and ePlus from the ePlus v. SAP case, including the complete P.O. Writer Plus Version 10 manual, I did not provide another copy to Lawson or ePlus.

7. I was deposed by attorneys from ePlus and Lawson on June 10, 2010.

8. On October 11, 2010, Ms. Hughey, the Lawson attorney, contacted me and asked whether I had copies of Chapters 3, 4, and 5 of the P.O. Writer Plus Version 10 Purchasing Module manual or if I could suggest any clients who might still have such copies.

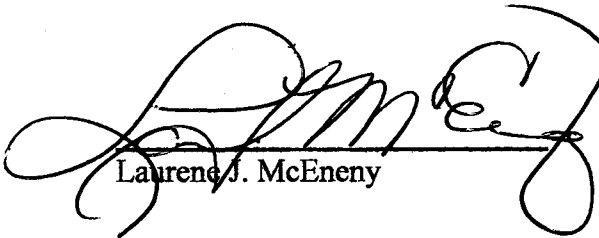
9. On October 11, 2010, I contacted Ms. Hughey and explained that my husband and I were in the process of moving and I would not be able to answer with certainty for at least two weeks, but that I thought that the whole Purchasing Manual was submitted in connection with the SAP trial.

10. On Friday October 22, 2010, I informed Ms. Hughey that I had found the files I believe I previously provided to the SAP attorneys. I verified that all chapters of Version 10 of the Purchasing Module manual were in my possession. This includes chapters 3, 4, and 5 of the Purchasing Module manual. I told her that it would be several more days before I could get the manual copied and sent to her.

and copy it for me. On Tuesday October 26, 2010, while I was still in the process of moving in, I provided the complete P.O. Writer Plus Version 10 Purchasing Module manual, including chapters 3, 4, and 5, to a Federal Express employee who showed up at the front door of my new residence in Florida to pick up the documents for Lawson's attorneys.

I declare under the penalty of perjury the foregoing is true and correct to the best of my knowledge.

Date: October 27, 2010



Laurene J. McEneny